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January 5, 1995

Mr. William F. Caton  
Acting Secretary  
Federal Communication Commission  
1919 M Street N.W.  
Washington, DC 20554

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RE: Response on FCC Revision CC Doc. No 94-102

Dear Mr. Caton:

The premise for my response to the proposed FCC Revision, CC Doc. No. 94-102, is as follows: I am an Electrical Engineer with over 40 years experience in the Electronic and Communication Industry. I am not associated with the Cellular Industry in any manner.

My findings after my investigation are as follows:

I can see merit in each of the segments of this proposed revision, with the exception for the labeling requirement. I find this provision totally without merit. I believe this provision should be seen as an attempt to limit someone's exposure to legal action. I have been informed by knowledgeable sources that many of the proposed changes are long over due.

I, conversely, can see the lack of merit with each of the segments of this proposed revision. The lack of merit I see is this revision regulates the "wouldn't it be nice" frills to an Emergency Service Number (911) that, in many places, is non-existence.

I note, that it there was no priority placed by the NENA/APCO on Emergency Service Number (911) via TTY/TDD devices as required by Title IV of ADA in this revision. Though the implementation of this Act was supposed to have occurred several years ago. I would like to indicate that Title IV specifies that the handicapped will have access to an Emergency Service Numbers by TTY/TDD devices. It does not specify "wire" or "wireless". I believe that it can be legally construed as either regardless of the political correctness of the terms used in any description! It is my opinion the Federal Government, with NENA/APCO, are guilty of discrimination in a most gross and wanton manner. In that the Federal Government legislates a requirement without legislating the necessary Federal commitment for a National Emergency Service Number (911).

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Geosynchronous satellite positioning would be of value, say in Zapata County, Texas. Conversely, It is of little value in New York City. The 400 foot Circle of Indicated Error requirement is no good in a populous area. However, where there are high rise buildings, how would the elevation be detected? Would you require altimeter be installed in a cellular phone along with the geosynchronous positioning circuitry? How would you calibrated this instrument? Where would this provisions for the requirements of positioning end?

Unfortunately when an emergency occurs an individual cannot assume there is Emergency Service Number (911). There is no way for an individual to know the areas served by 911 Emergency Service from those that are not served when outside of their home area. This revision does not address fact.

I made an Emergency Service 911 call in 1993. My emergency call went totally unanswered. This call concerning a burning vehicle, about 15 miles east of Champaign, Illinois along Interstate 74! I have correspondence from the Governor of Illinois to the effect that Cellular Emergency 911 service is monitored ONLY WITHIN THE METROPOLITAN CHICAGO AREA! I have communications from the Governors of Indiana and Kentucky stating that Cellular Emergency Service Number (911) calls are not monitored by any State agency. The Governors of both, Tennessee and Georgia have failed to respond to my simple request for information regarding the monitoring of Cellular Emergency Service Number (911) calls by State Agencies in two years.

Pursuant to my critical critique of this proposed revision, please do not tell me, I don't understand. Unfortunately, I do. I am handicapped. I have my cellular phone for one reason and one reason, EMERGENCY USE! When I am traveling, I cannot exit my vehicle, if there is insufficient room to operate the lift. Thereby precluding all roadside egress. I can greatly appreciate geosynchronous location, call back and routing provisions and the other frills. What good are frills, if there is no basic Emergency Service? Without the "basic" Emergency Service Number (911), how can the existing provisions of the law (ADA) be fulfilled? There are areas of South Carolina that are not served by any Emergency Service other than (\*HP) that is a public service provided by the Cellular Industry. What good are frills, if there is no basic Emergency Service?

With no Federal commitment for Emergency Service Number (911), is no Federal Statutes mandating an National Emergency Service Number (911) of either variety "wire" or "wireless" other than ADA. I must see this revision as an attempt in further regulation of an often times non-existent service. Therefore this revision can only be deemed as questionable, unnecessary and/or superfluous. The Federal Government is placing of further regulatory requirement on industries and the individual States without any further commitment from the Federal Government.

Gentlemen, the Joint Chiefs of Staff brought the concept of an Emergency Number after World War II. The National Associations of Fire Chiefs and President Johnson gave their endorsement in the 1960's for a National Emergency Service Number. But, this is where any and all Federal commitment died. The individual fifty States have been left to their own means for the implementation of an Emergency Service Number. Thereby creating a network, a hodgepodge network of areas that are served. When an emergency occurs an individual cannot assume there is Emergency Service Number (911). There is no way for the individual to know the areas served by 911 Emergency Service from those that are not served when outside of their home area. One County may have Emergency Service Number (911), while an adjacent County will not.

Your supporting documentation acknowledges the fact, on page 17, the extreme doubt that the enhanced Emergency Service Number (911) will ever be implemented by voluntary means. I have extreme reservations that Basic Emergency Service Number (911) will ever be seen nationwide. Your supporting documentation also reflects the dire necessity of having Cellular Phone monitored for at least "Basic" Emergency Service Number (911) by the Cellular traffic volume cited. Yet, again I must say "Where is the National Commitment for the Emergency Service Number (911) from Federal Government?"

Let's have a Federal Commitment from the Congress for a Standardized, National Emergency Service Number (911)s. Let's have the basics Federal Requirements in place, Nationwide, before placing regulatory requirements that supply the "wouldn't it be nice to have" frills to an Emergency Service Number that, in many places, is non-existence.

Thank you for giving me this opportunity to respond and your consideration in hearing my response. I trust you will find my response has merit. It is my hope that the Congress, in concert with the FCC, will proceed to assure that all areas of this country have at least "basic" National Emergency Service Number (911). You can then regulate the "frill" later. In all candor, it's time to stop the Federal Government from placing an over regulated cart before the Federal Government has a valid commitment to purchase the darn horse!

Sincerely,

A handwritten signature in black ink, appearing to read "Forest A. Southwick", with a stylized flourish at the end.

Forest A. Southwick

CC: Senator Strom Thurmond  
Senator Ernest Hollings  
Representative Lindsey Graham  
Mr. Brian O'Neill, Sprint Cellular  
Mr. Jack Platting, Bell Atlantic Mobile  
Mr. Ralph Inman, Director Greenville County E911